

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

**RECEIVED**

**OCT 25 1996**

In the Matter of

Implementation of the Local Competition  
Provisions in the Telecommunications Act  
of 1996

Interconnection Between Local Exchange  
Carriers and Commercial Mobile Radio  
Service Providers

CC Docket No. 96-98

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

CC Docket No. 95-185

DOCKET FILE COPY ORIGINAL

**MOTION FOR EXTENSION OF PAGE LIMIT**

1. Continental Cablevision, Inc., Jones Intercable, Inc., Century Communications Corp., Charter Communications Group, Prime Cable, InterMedia Partners, TCA Cable TV, Inc., Greater Media, Inc., Cable TV Association of Georgia, Cable Television Association of Maryland, Delaware & the District of Columbia, Inc., Montana Cable TV Association, South Carolina Cable Television Association, and Texas Cable & Telecommunications Association (collectively, "Joint Cable Parties" or "undersigned parties"), respectfully request that the Commission waive the 25-page limitation in Section 1.429(f) of the Commission's rules<sup>1</sup> for oppositions to petitions for reconsideration in the above-captioned proceeding.<sup>2</sup> Good cause exists for this Motion, which is in the public interest.

---

<sup>1</sup>47 C.F.R. § 1.429(f).

<sup>2</sup>See *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996* (CC Docket No. 96-98), *First Report and Order*, FCC 96-325, released Aug. 8, 1996 ("Interconnection Order" or "Order").

2. As the Commission is well aware, the present proceeding concerns an extraordinarily complex and extensive Order that will have a profound effect on the telecommunications industry and on customers. Numerous parties have responded with petitions for reconsideration and/or clarification, raising a myriad of intricate issues challenging almost every major aspect of the pole, conduit, and right-of-way access provisions of the *Interconnection Order*. Joint Cable Parties submit that they cannot properly respond to the petitions within the 25-page limit provided under the Commission's rules. Accordingly, the undersigned parties respectfully request that the Commission extend the page limit for opposition to petitions for reconsideration to 50 double-spaced pages.

3. An extension of the page limit is further warranted by the fact that the Common Carrier Bureau extended the page limit applicable to petitions for reconsideration in this proceeding from 25 to 50 pages. The Bureau found that "[t]he length of the order and complexity of issues presented may require greater discussion than the typical Commission order."<sup>3</sup> Fairness requires that the opponents to the petitions for reconsideration of the Order be permitted a similar page extension so that they have the opportunity to respond to each and every issue raised in the expanded petitions.

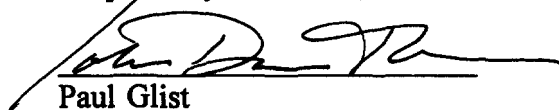
---

<sup>3</sup>*Implementation of the Local Competition Provisions in the Telecommunications Act of 1996 (CC Docket No. 96-98), and Interconnection between Local Exchange Carriers and Commercial Mobile Radio Service Providers (CC Docket No. 95-185)*, DA 96-1603 (Sept. 24., 1996). Joint Cable Parties note that, without specifically citing this ruling, Florida Power & Light and the American Electrical Power Service Corporation et al., respectively, submitted 48 and 50 page comments regarding pole, conduit, and right-of-way issues.

## CONCLUSION

For these reasons set forth above, Joint Cable Parties respectfully submit that good cause has been demonstrated for an extension of the page limit from 25 to 50 pages under Section 1.429(f), and that grant of this motion would serve the public interest.

Respectfully submitted,



Paul Glist

John Davidson Thomas

**COLE, RAYWID & BRAVERMAN, L.L.P.**

1919 Pennsylvania Avenue, N.W.

Suite 200

Washington, D.C. 20006

(202) 659-9750

**Continental Cablevision, Inc.**

**Jones Intercable, Inc.**

**Century Communications Corp.**

**Charter Communications Group**

**Prime Cable**

**InterMedia Partners**

**TCA Cable TV, Inc.**

**Greater Media, Inc.**

**Cable TV Association of Georgia**

**Cable Television Association of Maryland,**

**Delaware & the District of Columbia, Inc.**

**Montana Cable TV Association**

**South Carolina Cable Television Association**

**Texas Cable & Telecommunications  
Association**

Their Attorneys

October 25, 1996

## **CERTIFICATE OF SERVICE**

I, Elizabeth Johnson, certify that on this 25nd day of October, 1996, I have caused to be served a copy of the foregoing via U.S. First Class Mail, postage prepaid to the following:

Shirley S. Fujimoto  
Christine M. Gill  
Thomas J. Navin  
McDermott, Will & Emery  
1850 K Street, NW  
Suite 500  
Washington, DC 20006

Steven J. Del Cotto  
Duquesne Light Company  
411 Seventh Avenue 16-006  
P.O. Box 1930  
Pittsburgh, PA 15239

John H. O'Neill  
Norman J. Fry  
Shaw, Pittman, Potts & Trowbridge  
2300 N Street, NW  
Washington DC 20037-1128

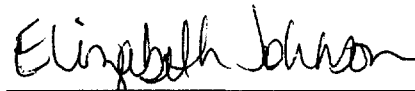
David L. Swanson  
Edison Electric Institute  
701 Pennsylvania Avenue, NW  
Washington, DC 20004

Jeffrey L. Sheldon  
Sean A. Stokes  
UTC  
1140 Connecticut Avenue NW  
Suite 1140  
Washington, DC 20036

Dale G. Stoodley  
Joanne M. Scanlon  
Delmarva Power & Light Company  
800 King Street, PO Box 231  
Wilmington, DL 19899

Linda L. Agerter  
Shirley A. Woo  
Pacific Gas and Electric Co  
Law Department, B30A  
PO Box 7442  
San Francisco, CA 94120

James Baller  
Lana Meller  
The Baller Law Group  
1820 Jefferson Place, NW  
Suite 200  
Washington DC 20036

A handwritten signature in cursive script that reads "Elizabeth Johnson". The signature is written in dark ink and is positioned above a horizontal line.

Elizabeth Johnson